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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JENNIFER LUNDGREN,

Plaintiff,

07 Civ. 4534 (WP4)

-against-

SEAN G. JULIUS, SHARON L. DAVIS,  
LICARE CORPORATION d/b/a  
VACCARO'S WINE & SPIRITS, and  
JOHN DOES 1-10,

Defendants.

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**PLAINTIFF'S INTERROGATORIES DIRECTED TO DEFENDANT VACCARO'S WINE & SPIRITS**

Plaintiff Jennifer Lundgren, by her attorneys, Baker, Leshko, Saline & Blosser, LLP, hereby requests that defendant Vaccaro's Wine & Spirits respond to the following interrogatories in accordance with the Federal Rules of Civil Procedure:

1. Please state:

(a) The name and address of the person or persons answering these interrogatories;

**ANSWER:**

2. Background Information:

Please state: Defendant's full name and address, its date of incorporation and its state of incorporation.

**ANSWER:**

3. Statements:

Are you aware of any statement made by plaintiff regarding the occurrence mentioned in the complaint , whether oral, written, or recorded in any way, including but not limited to, a stenographic, mechanical, electrical, audio, video, motion picture, photograph, or other recording, or transcription thereof, and if so, and please attach an exact copy of the original of said statement, interview, report, film or tape to your answers to these interrogatories; if oral, please state verbatim the contents thereof.

**ANSWER:**

4. Photographs:

State whether there exists photographs, videotapes, or movies with respect to the automobiles or scene of the occurrence mentioned in the petition. If so, state the following:

- (a) Describe each photograph, video, or movie;
- (b) State the date each was taken;
- (c) State the name and address of the person taking each such photo, video, or movie; and,
- (d) State the name and address, employer, insurer, and job title of the person presently having control or custody of each photograph, video or movie.

**ANSWER:**

5. Experts:

List and identify:

- (a) Each person this defendant expects to call as an expert witness at the trial, whether the witness is a retained expert or non-retained expert, stating for each such expert:
  - (i) Name;
  - (ii) Address;
  - (iii) Occupation;
  - (iv) Place of employment;
  - (v) Qualifications to give an opinion (if such information is available on an expert's curriculum vitae, you may attach a copy thereof in lieu of answering this interrogatory subpart); and,
- (b) With respect to each expert listed, please state the subject matter on which the expert is expected to testify and the expert's hourly deposition fee.

**ANSWER:**

6. Witnesses:

State the names and addresses of every person known by defendant, defendant's representatives or defendant's attorney, to have witnessed the occurrence mentioned in the complaint, or who was present at the scene within sixty minutes of the occurrence. Designate which of such people actually claim to have witnessed the occurrence.

**ANSWER:**

7. Criminal Record:

State whether defendant has ever pleaded guilty to or has ever been convicted of a felony or misdemeanor, (State or Federal) and if your answer is in the affirmative, please state:

- (a) The date of any such plea or conviction;
- (b) The state and county where said plea or conviction occurred; and,
- (c) The offense for which defendant pled guilty or was convicted.

**ANSWER:**

8. Insurance:

State whether or not any insurance company (including any company with excess or umbrella coverage) has an interest in the outcome of this litigation against defendant. If so, state the following:

- (a) The name of the insurance company;
- (b) Whether the insurance company is a stock company or a mutual company;
- (c) Name of the insured;
- (d) Type(s) of insurance;
- (e) Effective policy period;
- (f) Policy number;
- (g) Limits of the policy applicable to the occurrence mentioned in these pleadings; and,
- (h) Whether the policy provides for medical payments coverage, and if so, the amount of coverage.

**ANSWER:**



9. Co-Defendants

State whether you have any receipts or proof of payment of alcohol at your retail store by or on behalf of defendants Sean Julius and/or Sharon Davis. If so, please provide such documents or other proof.

**ANSWER:**

Dated: White Plains, New York  
October 25, 2007

**BAKER LESHKO SALINE & BLOSSER LLP**  
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